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OFFICE OF THE GENERAL COUNSEL

2008 MAY 12 AM 9:54

Federal Election Commission
Office of the General Counsel
999 E Street, NW
Washington, DC 20463

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FEDERAL ELECTION
COMMISSION
OFFICE OF THE GENERAL
COUNSEL

2008 MAY 12 P 1:15

MUR # 6009

May 7, 2008

To Whom It May Concern:

In accordance with federal law and regulations, I write to file a formal complaint against the campaign of Lance Sigmon for Congress (C00441865). The Sigmon campaign has accepted at least one unreported and prohibited in-kind corporate contribution, a clear violation of 2 U.S.C. § 441(b).

The in-kind contribution in question is the provision of office space and facilities by Hickory Travel and Tours, Inc., owned by John Cline of Hickory. The Sigmon campaign has been conducted out of this office, and the Sigmon campaign has not made any disbursements, as of their pre-primary report, to compensate Hickory Travel and Tours. I have personal knowledge of the location of the campaign headquarters, having visited there on May 5, 2008.

A contribution is defined in FEC regulations as "anything of value made by any person for the purpose of influencing a federal election." 11 C.F.R. 100.52(a). This would clearly include the provision of office space. Furthermore, I believe that Hickory Travel and Tours, Inc. has provided not just office space, but access to telephone lines (including long distance service), photocopiers, internet access, and facsimile machines. This is based on information and belief, received from others who have visited Hickory Travel and Tours, Inc. All of these are in-kind contributions. Anyone who visits Hickory Travel and Tours, Inc. is greeted by a receptionist, who also controls access to the Sigmon for Congress campaign. The Hickory Travel and Tours staff take messages for the campaign and direct visitors to the appropriate offices. This is also based on personal knowledge, and I believe this staff time is also an illegal and unreported corporate contribution.

Undoubtedly, by the time an investigation into this matter is initiated, the Sigmon campaign will have departed their offices at Hickory Travel and Tours, Inc. However, I can provide the names and telephone numbers of numerous individuals who have personal knowledge of the campaign headquarters and its housing within Hickory Travel and Tours, Inc.

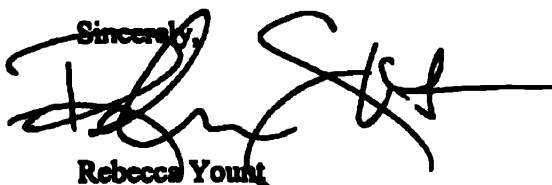
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Finally, in pursuing this matter, and in making a determination about any potential penalty or fine, please keep in mind that Mr. Sigmon is an attorney himself who has spent approximately \$100,000 of his own money in this campaign. He is not without resources, and should not be able to claim ignorance of this central tenet of the Federal Election Campaign Act. Therefore, I would urge you to find any violation was knowing and willful.

Please feel free to contact me with any questions about this information.

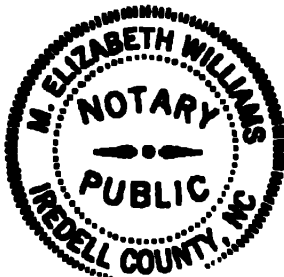
Sincerely,




Rebecca Yount
Campaign Manager
McHenry for Congress
P.O. Box 1406
Hickory, NC 28603

State of North Carolina
County of Catawba

Sworn to and subscribed before me
this 7 day of May
2008.



Notary Public:


M. Elizabeth Williams

My Commission Expires: April 11, 2009